

LAW OFFICES OF DALE K. GALIPO

Dale K. Galipo (SBN 144074)
dalekgalipo@yahoo.com
Cooper Alison-Mayne (SBN 343169)
cmayne@galipolaw.com
21800 Burbank Boulevard, Suite 310
Woodland Hills, CA 91367
Phone: (818) 347-3333

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SANDRA KIRKMAN, CARLOS
ALANIZ, individually and successors-in-
interest to JOHN ALANIZ, deceased,

Plaintiffs,

vs.

STATE OF CALIFORNIA, RAMON
SILVA, and DOES 1-10, inclusive,

Defendants.

Case No. 2:23-cv-07532-DMG-SSC

Assigned to:
Hon. Dolly M. Gee
Hon. Stephanie S. Christensen

**JOINT STIPULATION TO
CONTINUE FINAL PRETRIAL
CONFERENCE TO MARCH 25**

1 **TO THIS HONORABLE COURT:**

2 **IT IS HEREBY STIPULATED** by and between Plaintiffs SANDRA
3 KIRKMAN and CARLOS ALANIZ, individually and as successors in interest to
4 John Alaniz, deceased; and Defendants STATE OF CALIFORNIA, ACTING BY
5 AND THROUGH THE CALIFORNIA HIGHWAY PATROL, and RAMON
6 SILVA (“the Parties”), by and through their respective attorneys of record, as
7 follows:

8 1. The Final Pretrial Conference in this matter is currently scheduled for
9 March 18, 2025, at 1:30 p.m.

10 2. Plaintiffs’ lead trial counsel has a trial beginning on March 11, 2025, in
11 Fresno, California, which is expected to extend beyond March 18, 2025. *Mickel E.*
12 *Lewis Jr. et al v. Kern County et al*, 1:21-cv-00378-KES-CDB (E.D. Cal.). As a
13 result, counsel will be unavailable to participate in the Final Pretrial Conference as
14 currently scheduled.

15 3. Additionally, at the February 28, 2025 hearing on defendants’ summary
16 judgment motion, the Court extended the parties time to submit the pretrial
17 documents, including motions in limine and Daubert motions, from March 4 to
18 March 14, 2025. Doc. 73. Using the 7-days previously provided for oppositions to
19 those motions, see Doc. 45, the oppositions would be due on March 21, 2025 – after
20 the March 18 final pretrial conference. Parties agree that rescheduling the Final
21 Pretrial Conference would be beneficial as it would allow the Court time to review
22 the parties’ oppositions to the motions in limine and *Daubert* motions before the
23 final pretrial conference.

24 4. Accordingly, the Parties respectfully request that the Final Pretrial
25 Conference be continued to March 24, 2025, at 1:30 p.m., or to a date thereafter that
26 is convenient for the Court.

27 5. The Parties stipulate that GOOD CAUSE exists for this request, as it
28

1 will ensure that all counsel can meaningfully participate in the pretrial proceedings
2 and that the Court has sufficient time to consider the pending motions prior to the
3 Final Pretrial Conference.

4 **IT IS SO STIPULATED.**

5
6 DATED: March 7, 2025

DEAN GAZZO ROISTACHER

7 By: /s/ Lee H. Roistacher

8 Lee H. Roistacher, Esq.
9 Attorneys for Defendants, State of
California, acting by and through the
California Highway Patrol, and Ramon
Silva

10
11 DATED: March 7, 2025

LAW OFFICES OF DALE K. GALIPO

12 By: /s/ Cooper Alison-Mayne

13 Dale K. Galipo
14 Cooper Alison-Mayne¹
Attorneys for Plaintiffs

15
16
17
18
19
20
21
22
23
24
25
26 _____
27 ¹ Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all other signatories
28 listed, and on whose behalf the filing is submitted, concur in the filing's content and have
authorized the filing.